

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
FEDERAL-STATE BOARD ON)	GN Docket No. 96-45
UNIVERSAL SERVICE)	
)	
)	
LIFELINE AND LINK UP)	WC Docket No. 03-109
)	

REPLY COMMENTS OF YOURTEL AMERICA, INC.

Introduction

YourTel America, Inc. (“YourTel” or “Company”), respectfully submits these Reply Comments in response to comments filed by other entities in the current Lifeline and Link Up proceeding regarding the June 15th, 2010 request of the Joint Board for comments on the questions presented in the May 4th, 2010 Federal Communications Commission (“FCC” or “Commission”) *Referral Order*.¹

As described in its prior comments, YourTel is a small, minority owned telecommunications carrier headquartered in Kansas City, Missouri that provides local and long distance services to low-income customers in Kansas, Missouri, Oklahoma and Illinois.² YourTel has been designated as an ETC by the public utility commissions in Kansas, Missouri,

¹ See *Federal-State Joint Board on Universal Service Seeks Comment On Lifeline and Link-Up Eligibility, Verification, and Outreach Issues Referred To Joint Board*, FCC 10J-2 (rel. June 15, 2010).

² *Comments of YourTel America*, WC Docket No. 03-109, July 15, 2010.

Oklahoma and Illinois, has been an active participant in the USF low-income Lifeline and Link Up program since 2003 and a consistent vocal supporter of Broadband access for the underserved. The vast majorities of YourTel's customers are Lifeline eligible, are still struggling to gain affordable access to the information superhighway, 95% of them did not have telephone service prior to purchasing YourTel's services and virtually none of YourTel America's lifeline customers have Broadband.

REPLY COMMENTS

YourTel is encouraged by the discussion and focus on system automation as it believes that implementation of such would strengthen the clear intent the Lifeline and Link Up programs have to provide phone service to those without it and have trouble affording it. YourTel therefore takes this opportunity to address several specific points made in other comments in this Docket that YourTel feels either provides a basis for why such automation would be a good idea or provide good examples of how such automation is already working.

The Public Service Commission of the District of Columbia mentions the lack of control and rules that currently surrounds customers who might be obtaining discounted phone service from both a wire line and wireless ETC, so named "double dippers".³ The DCPSC also suggests penalizing a customer who might sign for duplicate Lifeline service. Since it is more than likely, despite any best efforts to make consumers aware, that a customer may simply not know of any such requirement and given that there is currently no means in place by which a "double dipper" can be identified, YourTel believes this is the perfect example of a situation that could be proactively alleviated by an automated

³ *Comments of The Public Service Commission of the District of Columbia*, WC Docket No. 03-109, July 15, 2010, pgs. 5 and 6.

system that would identify up front any such application for duplicate discounted service. Regardless, under the current environment, should an audit reveal one, it is not reasonable to think a carrier would be required to return any earned support. In the same vein, regarding continued verification procedures, a proactive automated system would ensure an eligible customer is exactly that. If the tool of automation is not or cannot be provided, and the burden of a manual verification process continues to be placed on the carrier, it would be simply unfair to expect support monies for non-eligible customers to now become a liability that could not be avoided or prevented by the carrier. Ultimately, that would harm all customers as cost increases would be passed on to eligible customers.

TracFone Wireless describes what appears to be an automatic enrollment process that involves the exchange of “lists” and an expanded the role of a state agency employee as an additional step in obtaining telephone service.⁴ YourTel cautions against any process that might make achieving the goal of subscribership additionally burdensome by requiring another point of contact for the consumer. It is true YourTel believes that state agencies need to become more involved but not as a burden to the agency and the consumer. Additionally a delay of up to a week in beginning the provisioning of phone service is exactly the type of issue that could be eliminated by an electronic system that pulls verification information from a single source at the immediate time of contact between customer and carrier.

“Consumer Groups” details an enrollment process also using the transfer of a list of eligible customers.⁵ However, though this process is more of “lead” generator for ETCs YourTel does welcome this idea and entrepreneurial companies would be well suited to use this method to reach out to consumers.

In its comments, The Florida Public Service Commission refers to an existing Lifeline certification and verification computer portal system that enables ETCs in its state to qualify candidates in

⁴ *Comments of TracFone Wireless*, WC Docket No. 03-109, July 15, 2010, page 6.

⁵ *Comments of... (“Consumer Groups”)*, WC Docket No. 03-109, July 15, 2010, page 15.

real time.⁶ YourTel heartily endorses this method as it underscores YourTel's important point that the purpose of the Lifeline and Link Up programs is to increase *telephone subscribership* and not just enrollment. The Florida PSC also describes an automatic enrollment process available in its state.⁷ While exemplary in the fact that it provides a functional process to increase Lifeline enrollment underutilized by many other states, it may fall short in the telephone subscribership approach as this methods only benefits those who already have phone service. A method that accounts for choice by the customer and engages CETCs and not just IETCs, such as the computer portal system, is optimal and allows Lifeline subscribership to become a function of a concerted sales and marketing strategy. The Nebraska Public Service Commission is right when it points out the lack of choice currently available to consumers and YourTel welcomes a broad discussion of what can be done to bring more competition to the market and believes improved competition policies would greatly increase subscribership⁸.

In response to other comments made by the Nebraska PSC, YourTel would like to continue to stress how critical the need for Broadband is amongst low-income underserved consumers. It is therefore vital we address the Lifeline issues first in order that the program becomes the robust vehicle to deliver the service for which it was intended.⁹ Though YourTel understands firsthand the current economic situation (by currently providing service to those most often hardest hit by it) it also understands the key role state agencies play in the process and encourages all states to adopt a cooperative role.

AT&T's PIN system proposal does have some advantages over the current process of Lifeline enrollment.¹⁰ However, it is critical to understand that low-income consumers must manage limited resources and although they may intend to subscribe one day their circumstances may change the next. If

⁶ *Comments of the Florida Public Service Commission in CC Docket No. 96-45 and WC Docket No. 03-109 regarding Lifeline and Link Up*, WC Docket No. 03-109, July 15, 2010, page 6.

⁷ *Id.*, Page 5.

⁸ *Comments of the Nebraska Public Service Commission*, WC Docket No. 03-109, July 15, 2010, page 4.

⁹ *Id.*, Page 4.

¹⁰ *Comments of AT&T*, WC Docket No. 03-109, July 15, 2010, page 9.

the PIN is not easily available when circumstances correct themselves the consumer will be worse off than they are today. Any time lapse increases the chances the PIN will be lost and if it cannot be easily re-issued this process will not be successful. To correct this, the PIN must be automatically issued contemporaneously to the program enrollment, be easily retrieved if lost or be a number the consumer already possesses (SSN, Medicaid Number, etc). The system will ultimately harm consumers if they have to make a “special trip” to get a PIN or if that PIN cannot be otherwise easily obtained.

Finally, in regards to expanding eligible programs, YourTel would like to echo Consumer Groups call to ensure all Lifeline participants have the opportunity to rely on income eligibility.¹¹ However, this is minimally used today given the extensive documentation needed to qualify and that must be cured for this to be of benefit to consumers.

CONCLUSION

The release of the May 4th, 2010 Commission Referral Order marks the beginning of a new stage of the Lifeline and Link Up programs. Since its inception, the Lifeline and Link Up programs have proved to be able and valuable in providing affordable telephone service to those who need it. Now, with the possible addition of Broadband, the need for these programs to go to the next level has arrived. Success will be enhanced by creating automated systems that make sense. We must ease the current enrollment burdens on both ETCs and customers and focus on increasing telephone subscribership and Broadband adoption. Achieving this requires the collaborative effort of carriers, state agencies and the Commission in refining and strengthening a program that allows for the extra layer of Broadband to be seamlessly integrated.

YourTel America looks forward to assisting in this goal and thanks the Joint Board and

¹¹ *Comments of...*(“Consumer Groups”), WC Docket No. 03-109, July 15, 2010, page 10.

the Commission for this opportunity to share its experience and views.

Respectfully submitted,

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